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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

TAY T. LE,

Plaintiff/Counter-Defendant,

v.

UNITED DEBT SETTLEMENT, LLC,

Defendant/ Counter-Plaintiff.

Case No. 5:24-cv-09421-VKD

**PLAINTIFF'S ANSWER TO
DEFENDANT'S COUNTERCLAIMS**

I. ANSWER TO DEFENDANT'S COUNTERCLAIMS

Plaintiff and Counter-Defendant, Tay T. Le, by counsel, respectfully submits the following Answer to Defendant's Counterclaims ("Counterclaims").

Plaintiff generally and specifically denies all allegations in the Counterclaims not specifically admitted in the paragraphs below and all allegations contained in the Counterclaim's headings and/or unnumbered paragraphs. Plaintiff's investigation of this action is ongoing and, therefore, it reserves its right to amend this Answer. In response to the Counterclaim's separately numbered paragraphs Plaintiff avers as follows:

A. Jurisdiction and Venue

1. Plaintiff admits.
2. Plaintiff lacks sufficient knowledge to form a belief as to what Defendant is seeking, therefore denies.

1 3. Plaintiff denies.

2 4. Plaintiff denies.

3 5. Plaintiff admits.

4 ***B. Relevant Background Facts***

5 6. Plaintiff admits.

6 7. Plaintiff denies.

7 8. Plaintiff denies.

8 9. Plaintiff denies.

9 10. Plaintiff denies.

10 11. Plaintiff denies.

11 12. Plaintiff denies.

12 13. Plaintiff denies.

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15 DATED: May 14, 2025

16
17 /s/Alexander J. Taylor
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CERTIFICATE OF SERVICE

I hereby certify that I today caused a copy of the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system, which will be sent to all attorneys of record.

/s/ Alexander J. Taylor